

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO

TATIA LIPE,

Plaintiff,

v.

Case No. 1:23-cv-00899-GBW-JMR

ALBUQUERQUE PUBLIC SCHOOLS,

Defendant.

NOTICE OF DEPOSITION

To: **Tatia Lipe**
c/o Boglarka Foghi, Esq.
Foghi Law Firm, LLC
P.O. Box 944
Corrales, NM 87508-0944
foghilaw@yahoo.com

PLEASE TAKE NOTICE that beginning at **10:30 a.m. on Tuesday, September 16, 2025**, and continuing from day to day thereafter until completed, Defendant Albuquerque Public Schools will take the deposition of **Plaintiff Tatia Lipe** before a certified Court Reporter, pursuant to the Federal Rules of Civil Procedure, at the offices of Cuddy & McCarthy, LLP, 201 Third Street NW #1300, Albuquerque, New Mexico 87102. Notice is further given that this deposition testimony may be used at trial for any and all purposes permitted by the Federal Rules of Civil Procedure.

Respectfully submitted:

CUDDY & MCCARTHY, LLP

By: /s/ M. Karen Kilgore
M. KAREN KILGORE
Attorneys for Defendant
Post Office Box 4160
Santa Fe, New Mexico 87502-4160
(505) 988-4476

CERTIFICATE OF SERVICE

I certify that on the 20th day of August 2025, the foregoing Notice of Deposition was emailed to the following counsel of record:

Boglarka Foghi, Esq.
Foghi Law Firm, LLC
P.O. Box 944
Corrales, NM 87508-0944
foghilaw@yahoo.com

/s/ M. Karen Kilgore
M. KAREN KILGORE